

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

MBIA Insurance Corporation and LaCrosse
Financial Products, LLC,

Plaintiffs,

-against-

Royal Bank of Canada and RBC Capital
Markets Corporation,

Defendants.

09 CIV 5044 (KMK)

ECF Case

DECLARATION OF JOHN H. CHUN
IN SUPPORT OF PLAINTIFFS'
MOTION TO REMAND

I, JOHN H. CHUN, hereby declare pursuant to 28 U.S.C. § 1746 as follows:

1. I am an attorney at the law firm of Quinn Emanuel Urquhart Oliver & Hedges LLP, counsel for Plaintiffs MBIA Insurance Corporation and LaCrosse Financial Products, LLC, and a member in good standing of the bar of this Court. I submit this declaration in support of Plaintiffs' Memorandum of Law in Support of its Motion to Remand pursuant to 28 U.S.C. § 1447.

2. Attached hereto as Exhibit A is a true and correct copy of the Summons with Notice filed by Plaintiffs on May 22, 2009 in the Supreme Court of the State of New York, Westchester County.

3. Attached hereto as Exhibit B is a true and correct copy of the Notice of Removal (without accompanying exhibits) filed by Defendants on May 28, 2009 in the United States District Court for the Southern District of New York.

4. Pursuant to the Court's permission at the July 17, 2009 pre-motion conference and Rule II.B of the Court's Individual Rules, attached hereto as Exhibit C is a true and correct copy of Plaintiffs' proposed Complaint.

I declare under penalty of perjury that the foregoing is true and correct.

DATED: New York, New York
August 5, 2009

A handwritten signature in black ink, appearing to be 'John H. Chun', written over a horizontal line.

John H. Chun